

LETTER G: U.S. FISH AND WILDLIFE SERVICE



United States Department of the Interior  
FISH AND WILDLIFE SERVICE  
Ventura Fish and Wildlife Office  
2493 Portola Road, Suite B  
Ventura, California 93003

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September 6, 2000

Memorandum

To: Superintendent, Channel Islands National Park, National Park Service,  
Ventura, California

From: *Diana K. Nadeau*  
Field Supervisor, Ventura Fish and Wildlife Office, Ventura, California

Subject: Draft Environmental Impact Statement for the Anacapa Island Restoration  
Project, Ventura County, California (A1415-CHIS)

We have reviewed your letter, dated July 11, 2000 and received in our office on July 13, 2000, requesting our comments on the draft environmental impact statement (EIS) for the subject project. The National Park Service (NPS) proposes to eradicate non-native black rats (*Rattus rattus*) from Anacapa Island and keep other islands rat-free. NPS presented six alternatives to accomplish this goal.

We applaud NPS's proactive efforts to restore the Channel Islands to a more natural state. We strongly support Alternative Two, the preferred alternative for the project. In this alternative, the rodenticide brodifacoum would be aerially broadcasted over the islands in November and December of 2000 and 2001. We believe that this alternative will best meet the purpose of the project by quickly and effectively eradicating black rats. We offer the following recommendations prepared in accordance with the Endangered Species Act of 1973, as amended, the Migratory Bird Treaty Act of 1918 (MBTA), and other authorities mandating Department of the Interior concern for environmental values:

- G1** { 1. The project has the potential to affect birds protected by the MBTA. This risk is highest for granivorous landbirds that could ingest poisoned bait and predators such as western gulls (*Larus occidentalis*) and barn owls (*Tyto alba*) that could scavenge poisoned rat carcasses. The MBTA prohibits the take of any migratory bird, or part, nest, or egg of any such bird (16 U.S.C. 703). A list of species that are protected by the MBTA can be found at 50 Code of Federal Regulations 10.13. We recommend that you take all reasonable steps to prevent impacts to birds that are protected by the MBTA.

**G1:** The NPS is aware of the MBTA and is mitigating to minimize any potential impact to non-target birds that would fall under the MBTA. This project is a significant conservation action to benefit many bird species in the long term. Upon the successful removal of rats from the island, there will be a rebound of seabirds and landbirds that are currently impacted by rats. In the long term, the restoration of bird habitat on Anacapa Island will enhance the local bird population protected under the MBTA.